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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

IN RE	§	
	§	
INDEPENDENCE FUEL SYSTEMS, LLC	§	CASE 22-60301-11
DEBTOR	§	

EMERGENCY MOTION FOR AUTHORITY TO USE OF CASH COLLATERAL

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Independence Fuel Systems, LLC (“Debtor”) and moves the Court under 11 U.S.C. §363 for Emergency Approval of Interim Use of Cash Collateral and would show the Court the following:

1. The Debtor filed a voluntary Chapter 11 Petition on July 14, 2022.
2. The Debtor must have cash to make payroll and to pay other immediate expenses to keep its doors open.
3. The Debtors business consists of the ownership and operation of 6 compressed natural gas fuel stations.
4. Origin Bank (“Origin”) asserts a first lien position, on all assets of Debtor which could

include, among other things the inventory and accounts receivable of Debtor (“Collateral”).

This Collateral may constitute the cash collateral of Origin as that term is defined in the Bankruptcy Code.

5. The Debtor is in immediately need to use the alleged cash collateral of Origin to maintain operations of the business. The continued operations of the Debtor will necessitate the use of the cash collateral.

6. The Debtor seeks to use the alleged cash collateral of Origin to make the payroll and continue operations. Debtor seeks interim use of the cash collateral for the uses set forth on Exhibit “A”.

7. An emergency exists in that the entire chance of the Debtor’s reorganizing depends on the Debtors ability to immediately obtain use the alleged collateral of Origin to continue operations of the companies while effectuating a plan of reorganization.

8. The Debtor is willing to provide Origin with replacement liens pursuant to 11U.S.C. section 552.

WHEREFORE, PREMISES CONSIDERED, the Debtor would request this matter be set down for an Emergency Hearing and that upon hearing, this Court enter and Order authorizing the Debtor’s Interim Use of the Cash Collateral of Origin in the amounts set forth in Exhibit “A” and to grant Origin, adequate protection in the form of replacement liens under 11 U.S.C. section 552, and for such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

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By: /s/ Eric Liepins
Eric A. Liepins, SBN 12338110

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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion was sent via telecopy or e-mail to the Brian Morris attorney of record for Origin Ban and the United States Trustee on this the 14th day of July 2022.

/s/ Eric Liepins
Eric A. Liepins

EXHIBIT A

OPERATING BUDGET

Natural Gas	4,800
Electricity	1,800
Station Communications	100
Rent Stations	7,000
Rent office	1,500
Contract Labor	1,500
Maintenance	1,500
Excise Taxes	2,500
payroll	17,500
Insurance	5,000
total	41,700